

The Honorable Judge Marsha Pechman

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

TRAVIS MICKELSON, DANIELLE H.
MICKELSON, and the marital community
thereof,

Plaintiffs,

v.

CHASE HOME FINANCE, LLC, an unknown
entity; JPMORGAN CHASE BANK, N.A., a
foreign corporation; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC., a foreign corporation; NORTHWEST
TRUSTEE SERVICES, INC., a domestic
corporation; JOHN DOES, unknown entities;
MORTGAGEIT, INC., a foreign corporation;
GMAC MORTGAGE CORPORATION, a
foreign corporation; CHICAGO TITLE, an
unknown corporation; ROUTH CRABTREE
OLSEN, P.S., a domestic Personal Services
Corporation; and FEDERAL HOME LOAN
MORTGAGE CORPORATION, a corporation,

Defendants.

No. C11-01445 MJP

**STIPULATION OF THE PARTIES FOR
EXTENSION OF FILING DATES**

AND SUBJOINED ORDER

**NOTE ON MOTION CALENDAR:
August 10, 2012**

Plaintiffs Travis Mickelson and Danielle Mickelson (“Plaintiffs”), and Defendants Northwest Trustee Services (“NWTS”), Vonnie McElligott (“McElligott”), and Routh Crabtree Olsen, P.S. (“RCO”) (collectively “Defendants” for this Stipulation), through their undersigned counsel, stipulate and agree to the following terms, and jointly request the Court enter the subjoined Order granting the same.

I. STIPULATION OF THE PARTIES

1. Plaintiffs recognize that the Local Court Rules prohibit them from filing a response to Defendants' Motion for Reconsideration. However, Plaintiffs concur with the alternative remedy sought therein; namely, amending the Order Setting Trial and Related Dates to permit an opportunity for addressing this case through summary judgment.

2. Given primary counsel's unavailability until August 22, 2012, the following amendments to the Order Setting Trial and Related Dates are requested: 1) dispositive motions due no later than September 7, 2012, 2) mediation and/or motions in limine must be completed by November 30, 2012, 3) an agreed pretrial order filed by December 21, 2012, 4) a pretrial conference scheduled according to the Court's availability, 5) trial briefs, voir dire questions, jury instructions, and exhibits due by December 28, 2012, and 6) a trial date of January 7, 2013.

3. The parties believe good cause exists for the extension of case scheduling dates as described above, and based on the argument presented in Defendants' Motion for Reconsideration. As such, the parties seek entry of the subjoined Order approving the same.

DATED this 10th day of August, 2012.

STAFNE LAW FIRM

By: /s/ Scott E. Stafne
Scott E. Stafne, WSBA #6964
Attorney for Plaintiffs

ROUTH CRABTREE OLSEN, P.S.

By: /s/ Joshua S. Schaer
Joshua S. Schaer, WSBA #31491
Of Attorneys for Defendants Northwest Trustee Services,
Inc., Vonnice McElligott, and Routh Crabtree Olsen, P.S.

II. PROPOSED ORDER

This matter having come before the Court on the Joint Stipulation of the parties for an extension of deadlines in the Order Setting Trial and Related Dates, and the Court having considered the following:

1. The Stipulation of the Parties, dated August 10, 2012, and incorporated by reference herein;
2. Defendants' Motion for Reconsideration, establishing a factual basis for good cause to alter the Order Setting Trial and Related Dates;

The Court being fully advised of the issues presented herein, and it appearing that the parties are entitled to their requested relief;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the following schedule shall now govern this case: 1) dispositive motions due no later than September 7, 2012, 2) mediation and/or motions in limine must be completed by November 30, 2012, 3) an agreed pretrial order filed by December 21, 2012, 4) a pretrial conference scheduled according to the Court's availability, 5) trial briefs, voir dire questions, jury instructions, and exhibits due by December 28, 2012, and 6) a trial date of January 7, 2013.

ORDERED this ____ day of _____, 2012.

HON. JUDGE MARSHA J. PECHMAN